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7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA
9

10 SAMUEL GALDAMEZ,

11 Plaintiff,

12 v.

13 UNITED STATES OF AMERICA,

14 Defendant.
15
16

CASE NO.: 2:20-cv-00152-KJM-AC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

17 The parties submit the following stipulation to extend the remaining discovery deadlines in
18 this matter by ninety (90) days. Pursuant to Fed. R. Civ. P. 16(b)(4), good cause exists to extend
19 these remaining deadlines. Because Plaintiff claims that he will need a total hip replacement, the
20 United States believes that an independent medical examination of Plaintiff will likely be necessary.
21 However, the United States Attorney's Office is authorizing in-person contacts for civil cases only in
22 extraordinary cases and, consequently, undersigned counsel is unable to obtain authorization for an
23 independent medical examination of Plaintiff at this time. Similarly, counsel for both parties would
24 prefer to conduct depositions in person rather than remotely.

25 The parties therefore respectfully request that the Court grant a ninety-day extension of time
26 of the remaining discovery deadlines. Due to the declining number of COVID-19 cases in California
27 and the increase in availability of COVID-19 vaccines, the United States anticipates that this ninety-
28 day extension of time will be sufficient to obtain authorization for in-person contacts in this case.

Accordingly, by and between the parties and subject to Court approval,
IT IS HEREBY STIPULATED that the following deadlines be extended by **ninety (90) days**:

Discovery matter	Original deadline	New deadline
Fact discovery cut-off	May 28, 2021	August 26, 2021
Expert disclosures	June 30, 2021	September 28, 2021
Rebuttal expert disclosures	July 30, 2021	October 28, 2021
Expert discovery cut-off	August 27, 2021	November 25, 2021
Dispositive motions heard	September 17, 2021	December 16, 2021

Dated: March 30, 2021

PHILLIP A. TALBERT
Acting United States Attorney

By: /s/ W. Dean Carter
W. DEAN CARTER
Assistant United States Attorney

Attorneys for Defendant
United States of America

Dated: March 30, 2021

STAWICKI ANDERSON & SINCLAIR

By: /s/ Nicholas Anderson
Nicholas Anderson

Attorneys for Plaintiff
Samuel Galdamez

Order

For good cause shown, the court **grants** the stipulation and approves the new deadlines, except for the deadline for dispositive motions to be heard. The court sets the deadline for dispositive motions to be heard for December 17, 2021.

IT IS SO ORDERED.

DATED: April 5, 2021.


CHIEF UNITED STATES DISTRICT JUDGE

STIPULATION AND ORDER